

**DRAFT  
NOTICE OF EXEMPTION**

**To:** Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street,  
Room 212  
Sacramento, CA 95812-3044

**From:** Department of Toxic Substances Control  
Tiered Permitting Corrective Action  
5796 Corporate Avenue  
Cypress, CA 90630

**Project Title:** Corrective Measures Proposal, Former Commonwealth Aluminum Facility

**Project Location:** 2211-2307 East Carson Street, Carson, California

**County:** Los Angeles

**Project Description:** The project is the cleanup of onsite soil contaminated from the previous aluminum recycling and manufacturing operations to protect human health and the environment. A detailed description of the site history and the proposed remedy is presented in the Corrective Measures Proposal, Former Commonwealth Aluminum Facility (CMP), dated November 8, 2007. The CMP presents in detail the proposed remedy, which consists of:

1. Excavation of onsite soils exceeding site-specific Risk-Based Screening Levels (RBSLs) and the transportation of the excavated soils to a permitted offsite disposal facility, and
2. Implementation of a Land Use Covenant (LUC) to limit future land use to only commercial/industrial uses.

The proposed remedy will protect human health and the environment by reducing the concentration, extent and volume of hazardous waste and hazardous waste constituents and will allow for redevelopment of the site for commercial/industrial uses.

**Project Background:** Since 1947 various companies have operated an aluminum recycling and rolling facility at the site. Previous owners/operators of the site include Apex Smelting Company, Alflex Corporation, Barmet Aluminum Corporation, Commonwealth Aluminum and Aleris. In 1993, Commonwealth Aluminum was authorized by DTSC to operate an onsite hazardous waste treatment facility pursuant to conditional authorization. Operations at the facility ceased in about March 2006 and the facility was decommissioned in November 2006. In a letter dated November 30, 2006, the Los Angeles County Fire Department concurred that closure of the conditionally authorized unit was found to be in compliance with regulatory standards and that all waste residues, containment system components, structures and equipment contaminated with hazardous waste had been removed or decontaminated. The property was acquired by ProLogis Exchange CA (7) LLC (ProLogis) in December 2006 and the property has been vacant since then.

Several investigations have been conducted at the site to investigate the presence and evaluate the extent of soil and groundwater contamination. These investigations show that subsurface soils were contaminated primarily with petroleum hydrocarbons from leaking underground storage tanks containing diesel and gasoline and from lubricating oil used during the aluminum rolling process. Low concentrations of several chlorinated volatile organic compounds were found in soil in limited areas. Soil saturated with lubricating oil was found beneath the rolling oil sump. Several volatile organic

compounds including trichloroethene, perchloroethene, 1,1-dichloroethene and 1,1-dichloroethane were detected at low concentrations in groundwater. Rolling oil was present as a thin layer on the groundwater in a limited area beneath the rolling oil sump and accumulated in several groundwater monitoring wells. The rolling oil was recovered periodically from several wells when enough oil had accumulated. The concentration of trichloroethene and 1,1-dichloroethene exceeded the California Department of Health Services Maximum Contaminant Levels (MCLs) during some of the previous groundwater quality monitoring events, but recent monitoring event data shows a trend of decreasing concentrations and the concentrations of volatile organic compounds are now less than their respective MCLs. Due to the limited concentration and extent of VOCs and the limited migration potential and amount of rolling oil, no groundwater remediation is proposed.

**Project Activities:** ProLogis proposes to excavate approximately 3,300 cubic yards of soil exceeding the site-specific Risk-Based Screening Levels (RBSLs) for a future commercial/industrial land use scenario. The five areas where soil exceeds the RBSLs are identified in the CMP and the proposed excavations will be to about 20 feet below ground surface (BGS) in some of these areas. Post excavation confirmation soil samples will be collected from each removal area to confirm that the cleanup goals have been achieved. If necessary, additional soil will be excavated and additional post confirmation soil samples will be collected until the cleanup goals are achieved. Once the excavation has been completed clean soil will be brought to the site and used to backfill the excavations. The soil excavation and backfilling of the excavations will take approximately 90 days to complete.

Excavated soil will be profiled based on analytical data from the site investigations, or by specific sampling requirements provided by the specific disposal facilities to ensure the waste is transported to the appropriate location. A Soil Management Plan presenting the procedures for the excavation and management of soil onsite has been prepared and incorporated in to the CMP. Excavated soils will be loaded onsite in to the dump trucks using an articulated front-end loader, or similar piece of equipment. Real-time dust monitoring for particulate matter of 10- microns (PM-10) will be performed using an MIE pDR-1000 particulate monitor (personal DataRAM), or equivalent, during excavation and loading. A Dust Monitoring Plan presenting the details of the air monitoring and dust control measures and a Health and Safety Plan for the activities required to implement the proposed corrective measures have been developed and incorporated into the CMP.

Approximately 220 truckloads, not to exceed 50 truckloads per day, will be needed to transport the soil to the permitted offsite facilities. All trucks will be covered prior to leaving the site and will be in compliance with applicable Department of Transportation (DOT) regulations. The waste manifests and/or Land Disposal Restriction notification forms will accompany each truck to the offsite disposal facilities. A Transportation Plan presenting how soils and demolition debris will be managed during transportation to the offsite disposal facilities has been prepared and incorporated in to the CMP. The transportation route to each disposal site was planned to minimize traffic congestion and to avoid residential neighborhoods and schools.

Soil classified as hazardous waste will be disposed of at the Kettleman Landfill located at 35251 Old Skyline Road, Kettleman City, California. Soil classified as non-hazardous waste will be disposed of at either the Kettleman landfill or the Azusa-BDC Special Waste Services Landfill operated at 766 S. Ayon Avenue, Azusa, California. Soils containing only non-hazardous levels of petroleum hydrocarbons may be sent to the Thermal Remediation Solutions treatment facility located at 1211 W. Gladstone Avenue, Azusa, California.

The proposed remedy also consists of a LUC restricting future use of the property to only commercial/industrial uses. The LUC will be signed by DTSC and ProLogis and recorded with the

Office of the County Recorder. The LUC will "run with the land" limiting future owners and operators to only commercial/industrial land uses. DTSC has authority to enforce the LUC pursuant to State law.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Commonwealth Aluminum

Contact: Mr. T. Patrick Maloney, First Vice President.

Exemption Status: (check one)

- ☐ Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- ☐ Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
- ☐ Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
- ☐ Categorical Exemption: [Title 14, CCR, Sec. 15330 ]
- ☐ Statutory Exemptions: [State code section number]
- ☒ General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: With Certainty, No Possibility of a Significant Effect on the Environment

Reasons Why Project is Exempt: The project is a short-term removal action to eliminate the potential threat of hazardous substances by excavation and offsite disposal of contaminated soils, thereby reducing potential risk for future site occupants and the environment. The removal activities will not cause a significant effect on the environment because:

1. The facility is located in an area designated as "heavy industry" by the City of Carson General Plan and receptors are limited to adults with in a commercial/Industrial setting. No School, daycare centers and residential areas are located with in 0.25 mile of the site.
2. Dust suppression measures (covering and spraying water on stockpiles) and monitoring of particulate air emissions will be conducted during excavation, stockpiling, loading and transport off the site. If necessary, a foam agent such as Conover will be applied to eliminate odors and dust from the soils. The CMP includes a Soil Management Plan, Air Monitoring Plan and Health and Safety Plan to inform all onsite workers and visitors of the proposed activities and monitoring and response actions to maintain a safe work environment. ProLogis has obtained a stormwater permit from the California Regional Water Quality Control Board, Los Angeles Region, for onsite construction/cleanup activities to prevent stormwater pollution. No additional stationary sources of air emissions are required for this project. Temporary mobile sources include the operation of standard excavation, loading and transport equipment. The dump trucks will be used to transport excavated soil offsite for disposal at permitted facilities and clean imported soil will be used to backfill the excavations.
3. Work activities will be conducted on weekdays between the hours of 6 a.m. to 5 p.m. and all required permits necessary to implement the recommended corrective measure will be obtained from the appropriate regulatory authority with copies provided to DTSC prior to implementation of the proposed remedy.
4. The proposed traffic route has been selected to minimize noise impacts to residential neighborhoods and other sensitive facilities such as schools and hospitals. Trucks used to transport the soils will be required to have mufflers in good working order in accordance with

applicable State requirements and will be required to have the proper Department of Transportation placards identifying the trucks contents.

5. Traffic control measures will be implemented to minimize disruption of traffic from trucks entering and leaving the site. Before implementing the proposed remedy ProLogis will submit the Transportation Plan to City of Carson with a letter requesting confirmation that transportation routes described in the plan are acceptable. A flag man will be located at the site to assist the truck drivers to safely enter and exit the site. Appropriate signage will also be provided to control traffic. Trucks will be staged on the property while loading activities are being conducted. While on the property, all vehicles will be required to not exceed 5 miles per hour for worker safety and to minimize generation of dust. All trucks will be decontaminated prior to leaving site.
7. A LUC will limit future use of the land to only industrial/commercial uses. The LUC will eliminate the potential risk from residual contamination at the site by prohibiting the use of the property as a residence, hospital, hospice, or school for persons under the age of 21, or daycare center. The LUC will indicate that further corrective measures may be required upon any changes in land use from industrial/commercial land use to any sensitive use. It also will provide for notification of construction or utility workers prior to any subsurface intrusive work that low concentrations of chemicals of concern are present in the subsurface soil. The LUC will include provisions to ensure the ongoing inspection and enforcement and DTSC can enforce the provisions of the LUC pursuant to State law.
8. No biological or cultural resources are known to exist at this location.
9. The site is not on the Hazardous Waste Substances Site List compiled pursuant to Government Code Section 65962.5.

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Date Received For Filing and Posting at OPR: